CHAPTER 5

EFFICIENT ADMINISTRATION OF THE NPS PROGRAM

Efficient administration is an over-arching goal of the Montana NPS program. Substantial increases in NPS funding in 1999 and 2000 and limited numbers of staff positions for grant management have made this goal difficult to reach. DEQ has several new objectives which are designed to find new ways to help NPS project contractors and agency staff maintain accurate records and produce timely reports.

Montana has improved and updated its non-point source program resources by adding new staff, promoting good local projects, integrating NPS management objectives of other agencies with DEQ programs, and providing a strong focus on information and education. Along with these improvements, DEQ has developed administrative procedures to track project accomplishments, reports, products, and financial activities. This chapter highlights the new initiatives and ongoing activities.

5.1 EVALUATION AND REPORTING

5.1.1 Regional Coordinators

In an effort to improve NPS management and communication, DEQ has divided the state into four regions based on watershed boundaries. The regional coordinators track NPS projects and coordinate with other organizations and local groups on watershed management related initiatives including TMDLs. The regions are the Columbia basin, Upper Missouri basin, Lower Missouri (below Great Falls), and Yellowstone River basin. Having one person stay familiar with all of the various projects and attend local group meetings in a region is expected to promote better coordination by enhancing "networking" opportunities and developing closer personal interaction on projects.

5.1.2 Monitoring

Monitoring is an important element of the NPS program both at the project level and state level. Local projects are monitored to determine BMP effectiveness and overall project effectiveness. DEQ helps groups implement NPS projects by advising on the design of monitoring programs and by helping with the interpretation of monitoring data. The department is promoting sampling for biological and physical parameters as a better measure of aquatic and riparian health and project success. Annually the department reviews overall program effectiveness and reports to EPA. DEQ uses a project close-out process as one of the chief ways of doing this. Project sponsors of a finished project are interviewed and asked detailed questions on their working relationships with DEQ, how well bills were handled, contracts managed, and the quality of interactions they had with DEQ monitoring and planning specialists in accomplishing their project's objectives. DEQ also uses the contract start date as a measure of contracting efficiency. The closer to April 1 that DEQ finishes contracting, the better it did in terms of timeliness. The NPS program's objective is to have contracts in place each year by the April 1, in time to collect water quality data prior to the start of the field season. July 1 is the deadline for budgeting state contractual funds without special legislative exceptions. Program effectiveness is also gauged by how well the sponsor met project milestones, the quality of the products, and the improvements in water quality. Finally, DEQ will evaluate program

effectiveness each year in terms of how well it met short-term objectives in the NPS management plan. Each annual report will contain short term objectives for the coming year.

DEQ will continue to use STORET to share data with EPA and other agencies. NPS monitoring data validated by DEQ will be entered into a state data management system which will be compatible for transfer over to the STORET system.

Monitoring Work Group: In 1999 DEQ formed an advisory group on monitoring issues. The group was formed under the auspices of the Montana Watershed Coordination Council. The group has developed a work plan and will continue to meet routinely to discuss monitoring methods, to refine state strategies for monitoring, and identify methods to improve data analysis and management.

Quality Assurance (QA) Plan: The state developed a state NPS Quality Assurance plan in 1994 to help guide project contractors in ways to ensure that data of usable quality is collected and managed properly. The plan provides a good framework for local groups that used it for local QA planning. DEQ is reviewing its QA plan and will be revising it within the next two years.

Objective (July 2001) Provide a new staff position in the Monitoring and Data Management Bureau who will be responsible for overall water monitoring Quality Assurance.

Objective (July 2001) Prepare and complete public review and adoption of a new Water Quality Monitoring QA plan for the state that addresses NPS monitoring.

5.2 FISCAL ACCOUNTING SYSTEM

DEQ follows standard and accepted accounting practices and strives to meet all state and federal laws and regulations regarding contract and fiscal management. The state has gone to an modern Oracle-based accounting system. The NPS program has also adopted the following tools to help it achieve efficiency and order in fiscal accounting.

PROJECT SPREADSHEETS: DEQ maintains a spreadsheets on all projects funded with 319 funds. These spreadsheets are updated with each payment and circulated by the administrative staff to regional NPS project managers. The sheets contain information on both local and federal match in addition to the payment record. These spreadsheets are filed along with each payment cover sheet and provide a record for reconciliation of accounts with project contractors.

ATTACHMENT Bs: DEQ provides NPS project sponsors with a spreadsheet-billing form called an Attachment B. It is an attachment to the funding agreement or contract. The Excel or Lotus automated spreadsheet format helps reduce math errors by the contractors and keeps bills organized with cumulative totals organized by project task.

Fiscal Status Reports (FSRs): FSRs are completed each year by DEQ Central Services Division. They provide an annual check on the total grant expenditures and match funds spent and assigned to each grant. These reports provide another check on the program's expenditure records, helping to ensure that funds are carefully accounted for.

Objective (By May 2001) Provide Attachment B spreadsheet-billing forms to all NPS project contractors

Grant Reporting and Tracking System (GRTS): The grant reporting and tracking system used by DEQ's NPS program is a key administrative tool for successful management and reporting.

The GRTS database was developed by EPA to provide states with a consistent way to report on the status of nonpoint source grants, including both staffing and support activities, as well as, local pollution control projects funded by those grants. The database is kept up to date by the Montana DEQ.

Objective (Every 6 months) Each May and November update NPS projects by task to GRTS mainframe.

Objective (Annual) Each November update will include an annual check on total grant expenditures and match funds spent.

Long Term Objective (By October 2001) Make GRTS updates available to all NPS project contractors via web-based database.

5.3 PROGRAM COORDINATION

5.3.1 Interagency Coordination

One of the primary reasons for using a watershed approach in this document is to provide a coordination tool for use by DEQ programs. By using watersheds, DEQ intends that this approach will foster greater understanding and involvement in water quality issues by other agencies in the state, in particular, local watershed groups and county governments.

Montana Watershed Coordination Council (MWCC): DEQ intends to maintain an active role in this organization. The Council provides an excellent forum for a wide variety of water resource management groups to share information on water quality and other environmental issues. The Water Activities Work Group has provided DEQ with valuable technical support for the past 6 years in the review of local project grants for watershed restoration and groundwater protection as well as statewide educational projects. This review results in recommendations to DEQ each year for NPS funding. The Water Activities Work Group also provides recommendations to DEQ on it NPS management plan and was therefore involved in the review of drafts of this document. The NPS management plan will be reviewed by this Council, as well as DEQ program staff, every 5 years. DEQ will turn these recommendations into revisions as necessary and present the document to the public for review and comment. The Water Activities Work Group has also assisted DEQ by providing it and other state and federal agencies with options for conducting a biennial "unified watershed assessment" for supplemental Section 319 NPS funds. Supplemental funds under the Clean Water Action Plan will be used in 2001 and 2002 for watershed project implementation based on this assessment.

The Linking Work Group is also a part of the MWCC and has developed an excellent web page for the Council. This group has considerable expertise in the use of geographic and other data as a tool in watershed management. DEQ continues to participate in this work group and will

Long Term Objective (Every 2 years) DEQ will work closely with MWCC to prepare and publicize a "unified watershed assessment" for targeting supplemental NPS grant funds.

Long Term Objective (Every 5 years): MWCC will review Nonpoint Source Management Plan and make recommendations on revising it to meet changing needs.

seek recommendations of the committee on other information sharing issues as they develop.

Federal Agency Coordination and Consistency Review: DEQ and the federal agencies most involved in watershed management initiatives have operated for almost 14 years under various Memorandums of Understanding and similar coordination and technical assistance agreements. The closest coordination in the past has been with the USDA's Natural Resources Conservation Service, who has jointly funded interagency personnel agreements to house staff members at DEQ and in the nearby Lewis and Clark Conservation District. These staffing agreements provide valuable communication, technology transfer, and coordination opportunities for all agencies involved.

The MOUs (Memorandums of Understanding) with the NRCS, Forest Service, BLM, and Montana Department of Transportation address how these agencies will help DEQ carry out its NPS pollution control duties. While MDT is a state agency, its use of federal funds can have potentially important NPS implications. The primary subjects of these memorandums are data sharing, addressing water quality limited streams, and reporting on proposed activities so that DEQ has adequate opportunity to provide a review and comments of activities that might cause NPS impacts to state waters.

USFS 1987 Memorandum of Agreement: The U.S. Forest Service has had an agreement in place since 1987. A new draft has been circulated to the USFS Region 1 office in Missoula. The Regional Hydrologist and NPS program manager at DEQ will negotiate revisions to this draft that achieve each agencies mutual interests in protection of water quality relating to nonpoint sources. The department will also be developing a revised MOU with the U.S. Bureau of Land Management to reflect changes in state and federal management policies.

Objective (October 2001) Complete development and sign new MOUs with the Forest Service and BLM regarding coordination on water quality planning.